

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

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THE DEPOSITION OF JIM LANCE

PIGEON, produced as a witness on behalf of the
Plaintiff in the above styled and numbered cause,
taken on the 25th day of May, 2007, in the City of
West Siloam Springs, County of Delaware, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

1 it was like a water quality workshop that I attended
2 at -- I believe it was at the University of
3 Arkansas.

4 Q Would you please hold your place on this
5 document and go to Page 612 in this same exhibit and
6 look at the poultry water quality handbook that
7 exists there.

12:54PM

8 A Okay.

9 Q This document at Page 612 indicates it's been
10 printed with permission of the Water Quality
11 Consortium and it has Peterson Farms on it at the
12 bottom; do you see that?

12:55PM

13 A Yes.

14 Q Is that the one Peterson Farms gave you?

15 A I believe so, yes.

12:55PM

16 Q Do you know how and when you obtained it from
17 them?

18 A I would not know. I don't remember.

19 Q Did you read the document that's shown
20 starting at Page 612 in this exhibit?

12:55PM

21 A Not in its entirety, no.

22 Q All right. Let's then go back to the document
23 at Page 492. You said in your testimony that you
24 thought you got one at a water quality seminar.

25 Would the document at Page 492 be that document or a

12:55PM